

EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARBUTUS BIOPHARMA CORPORATION
and GENEVANT SCIENCES GMBH

Plaintiffs,

v.

MODERNA, INC. and MODERNATX,
INC.,

Defendants.

C.A. No. 22-252-MSG

**CONTAINS INFORMATION
MODERNA DESIGNATED HIGHLY
CONFIDENTIAL – OUTSIDE
COUNSEL EYES ONLY**

PLAINTIFFS’ INITIAL INFRINGEMENT CONTENTIONS

Pursuant to the Court’s Scheduling Order (D.I. 72) and Paragraph 4(c) of the Court’s Default Standard for Discovery, Including Discovery of Electronically Stored Information, Plaintiffs Arbutus Biopharma Corporation (“Arbutus”) and Genevant Sciences GmbH (“Genevant”) disclose their initial infringement contentions regarding U.S. Patent Nos. 8,058,069 (“the ’069 patent”); 8,492,359 (“the ’359 patent”); 8,822,668 (“the ’668 patent”); 9,364,435 (“the ’435 patent”); 9,504,651 (“the ’651 patent”); and 11,141,378 (“the ’378 patent”) to Defendants Moderna, Inc. and ModernaTX, Inc. (collectively, “Moderna”).

Plaintiffs’ initial infringement contentions are based on the information currently available to, and known by, Plaintiffs. Fact discovery is ongoing, and Plaintiffs have not yet obtained any deposition testimony from Moderna. The Court has not yet construed any of the asserted claims of the patents-in-suit. The Court has set a schedule pursuant to which the parties will identify terms for construction, provide proposed constructions, cite evidence supportive of those constructions, confer to narrow the disputes before the Court, and then submit, through briefing and oral presentations, their arguments to the Court. The Court will then construe the disputed

their infringement contentions as the pre-trial phase of the litigation proceeds and as additional information comes to light. Plaintiffs specifically reserve the right to supplement these infringement contentions in view of future production of documents, the Court's issuance of a claim construction order, and expert opinions and testimony.

These appended claim charts are provided without prejudice to Plaintiffs' right to introduce expert opinions and demonstratives as expert discovery progresses, and to produce and introduce at trial all evidence, whenever discovered, relating to the proof of currently known and subsequently discovered facts. In addition, the division of each claim into individual limitations below is for convenience only and is without prejudice to Plaintiffs' right to argue for a different division at a later date.

OF COUNSEL:

David I. Berl
Adam D. Harber
Thomas S. Fletcher
Shaun P. Mahaffy
Jessica Palmer Ryen
Anthony H. Sheh
Lydia B. Cash
WILLIAMS & CONNOLLY LLP
680 Maine Avenue SW
Washington, DC 20024
(202) 434-5000
*Attorneys for Plaintiff Genevant
Sciences GmbH*

Daralyn J. Durie
Shaelyn K. Dawson
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105-2482
(415) 268-6080

/s/ Karen E. Keller

John W. Shaw (No. 3362)
Karen E. Keller (No. 4489)
Nathan R. Hoeschen (No. 6232)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
kkeller@shawkeller.com
nhoeschen@shawkeller.com
Attorneys for Plaintiffs

Kira A. Davis
MORRISON & FOERSTER LLP
707 Wilshire Boulevard
Los Angeles, CA 90017-3543
(213) 892-5200

David N. Tan
MORRISON & FOERSTER LLP
2100 L Street, NW, Suite 900
Washington, DC 20037
*Attorneys for Plaintiff Arbutus
Biopharma Corporation*

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CERTIFICATE OF SERVICE

I, Karen E. Keller, hereby certify that on April 24, 2023, this document was served on the persons listed below in the manner indicated:

BY EMAIL:

Jack B. Blumenfeld
Brian P. Egan
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
began@morrisnichols.com

James F. Hurst
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2000
james.hurst@kirkland.com

Alina Afinogenova
KIRKLAND & ELLIS LLP
200 Clarendon Street
Boston, MA 02116
(617) 385-7500
alina.afinogenova@kirkland.com

Patricia A. Carson, Ph.D.
Jeanna M. Wacker
Mark C. McLennan
Nancy Kaye Horstman
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
(212) 446-4800
patricia.carson@kirkland.com
jeanna.wacker@kirkland.com
mark.mclennan@kirkland.com
kaye.horstman@kirkland.com

Yan-Xin Li
KIRKLAND & ELLIS LLP
555 California Street, 27th Floor
San Francisco, CA 94104
(415) 439-1400
yanxin.li@kirkland.com

/s/ Karen E. Keller

John W. Shaw (No. 3362)
Karen E. Keller (No. 4489)
Nathan R. Hoeschen (No. 6232)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
kkeller@shawkeller.com
nhoeschen@shawkeller.com
Attorneys for Plaintiffs